

PMSTPCOL PEmails

From: Joseph, Stacy
Sent: Wednesday, November 25, 2009 11:52 AM
To: 'Cashell, George S'; 'ccchappell@stpegs.com'
Cc: STPCOL
Subject: DRAFT RAIs Related to SRP Chapter 16
Attachments: RAI 3973.doc; RAI 4044.doc; Chapter 16 RAI Status.xls

Coley and Steve,

Attached are draft RAIs related to Chapter 16. Please let me know by FRIDAY, DEC 4 if you require a telecon for clarification of the RAIs. If I do not hear from you by COB next Friday, I will assume your understanding is clear and I will issue the RAIs.

I have also attached an updated Table with the status of Ch. 16 RAIs. Please note that there is one new RAI in the review process. This RAI has to do with STD DEP 8.3-1. I expect to send a draft of this RAI next week.

Thank you,
Stacy

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RAI 3973.doc	36346	
RAI 4044.doc	32250	
Chapter 16 RAI Status.xls	28154	

Options

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Request for Additional Information No. 3973 Revision 2

South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 16 - Technical Specifications
Application Section: 16.3.3

QUESTIONS for Technical Specification Branch (CTSB)

16-***

This RAI supplements RAI 16-21 and addresses the following issues identified in reviewing the applicant's responses to the 24 issues raised in RAI 16-21.

1. Provide a standard departure from the GTS and bases for changes associated with Specification 5.5.2.11 and instrumentation surveillance requirements which include verifying instrumentation trip or actuation settings, and that were proposed in response to RAI 16-21 Issue 1. This includes the following SER Table 16.1 COL Items for sensor channel calibration trip setpoint allowable values, and the associated GTS surveillance requirements:
 - o Item 20 – SR 3.3.1.1.10
 - o Item 22 – SR 3.3.1.1.11
 - o Item 31 – SR 3.3.1.4.6
 - o Item 42 – SR 3.3.4.1.3
 - o Item 45 – SR 3.3.4.2.3
 - o Item 61 – SR 3.3.7.1.3
 - o Item 64 – SR 3.3.8.1.2
2. In the table listing the disposition of the COL items in the response to RAI 16-21 Issue 13, the resolution method for SER Table 16.1 COL Item 64 was changed from Option 2 to Option 3. Specifically, the applicant proposed to revise GTS SR 3.3.8.1.2 to state, "Perform CHANNEL CALIBRATION on each required CHANNEL consistent with Specification 5.5.2.11, "Setpoint Control Program (SCP)." However, Table 16.1 COL Item 64 is not resolved because typical setpoint calculations for the instrumentation functions required by GTS 3.3.8.1 are not included in topical report WCAP-17119-P, "Methodology for South Texas Project Units 3 and 4 ABWR Technical Specification Setpoints Advanced Boiling Water Reactor South Texas Project Units 3 and 4," Revision 0, dated October 2009. The applicant is requested to include such calculations in WCAP-17119-P.
3. Revise the ABWR generic technical specifications (GTS) Channel Function Test (CFT) definition (in GTS Section 1.1) to require instrumentation setpoint verification, similar to the Channel Operational Test in NUREG-1431, the Westinghouse standard technical specifications (STS), and revise the CFT surveillance requirements to reference STP Units 3 and 4 plant-specific technical specification (PTS) 5.5.2.11 as

do the PTS Channel Calibration surveillance requirements. The PTS and bases for these surveillance requirements should not refer to the instrument channel trip setpoint Allowable Value (AV) because WCAP-17119-P does not use this term. This issue is a follow-on to RAI 16-21 Issue 1.

4. Regarding PTS 5.5.2.11 which was proposed in response to RAI 16-21 Issue 1, STPNOC is requested to
 - a. Retain model paragraph c.1.ii and replace “AV” with “AFT”;
 - b. Add CFT to paragraph c; see Issue 2 above;
 - c. Correct paragraph e by removing “LTSP” in the next to last sentence;
 - d. Explain the phrase in paragraph b, “As-Found Tolerance (AFT) which serves as the Limiting Trip Setpoint (LTSP) in the direction of interest.” Explain using LTSP. Explain what is meant by “LTSP in the direction of interest”;
 - e. Explain use of AV if it is not an Operability criterion and is not defined in the setpoint methodology;
 - f. Explain how sensor drift and actuation logic drift are accounted for in determining instrumentation trip or actuation settings;
 - g. Confirm that the calculated quantities listed in the PTS 5.5.2.11 match the terms calculated in the setpoint methodology. Discuss whether CSA and margin should be listed in the SCP specification.
 - h. Remove the reviewer’s note from the PTS. Confirm that the setpoint methodology is consistent with Notes 1, 2, and 3. Discuss the relevance of Note 4 to the setpoint methodology.
 - i. Consider whether the SCP specification should reference topical report WCAP-17137-P, “Westinghouse Stability Methodology for the ABWR,” concerning the OPRM setpoint determination.
5. Provide a standard departure from the GTS 3.3.5.1 bases for changes proposed in response to RAI 16-21 Issue 9, regarding SER Table 16.1 COL Items 47 and 48.
6. Provide a standard departure from the GTS 3.3.5.1 bases for the 24-hour Frequency of GTS SR 3.3.5.1.6 proposed in response to RAI 16-21 Issue 11, regarding SER Table 16.1 COL Item 54.
7. In its response to RAI 16-21 Issue 18, the applicant proposed completing the bases for GTS SR 3.7.7.3 by designating the “Technical Requirements Manual” as the site-specific document containing the response time limits for the main turbine bypass system instrumentation functions. This information is intended to resolve Table 16.1 COL Item 103. The applicant is requested to discuss in the FSAR the purpose and content of the “Technical Requirements Manual,” and the quality assurance controls it plans to implement for it. The staff requests that the FSAR contain this information

to ensure that the acceptance criteria for PTS response time surveillances are adequately controlled.

8. In its response to RAI 16-21 Issue 24, the applicant referenced GTS 5.7.1.1(b). The correct reference is GTS 5.7.2 for Table 16.1 COL Item 156.
9. In its response to RAI 16-21 Issue 1, for SER Table 16.1 COL Item 20, in the table listing COL item resolutions, the applicant stated that SSLC Function 1c, "SRNM ATWS Permissive," of GTS Table 3.3.1.1-1 is also designated as being resolved through Option 3. However, neither GTS SR 3.3.1.1.10 or SR 3.3.1.1.11 are specified for Function 1c in Table 3.3.1.1-1 in Revision 3 of the COL application, Part 4. The applicant is requested to correct this inconsistency.

Request for Additional Information No. 4044 Revision 2

South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 16 - Technical Specifications
Application Section: Part 4, 16.3.8.4

QUESTIONS for Technical Specification Branch (CTSB)

16-***

The first sentence of the bases for Required Actions D.1 and D.2 of GTS 3.8.4 does not address all the required actions for Conditions A, B, and C, that would lead to entry into Condition D, which is a conflict that could lead to an interpretation issue during plant operation. STPNOC addressed this inconsistency in STD DEP 16.3-42, but did not fully correct it. STPNOC's response to RAI 16-52, which pointed this out, was to withdraw the proposed fix; so the inconsistency in the bases remains but still needs to be corrected. The applicant is requested to revise STD DEP 16.3-42 by replacing the initial sentence in the bases for GTS 3.8.4 Required Actions D.1 and D.2 with a sentence similar to one of the two following sentences, to clarify the intent of Condition D, which states, "Required Action and associated Completion Time not met."

(1) The unit must be brought to a MODE in which the LCO does not apply if the inoperable Division I, Division II, or Division III DC electrical power subsystem cannot be restored to OPERABLE status within the associated Completion Time for Required Action A.5 or C.1; if the inoperable Division IV DC electrical power subsystem cannot be restored to OPERABLE status within the associated Completion Time for Required Action C.2 or the implied operability-restoration required action of Condition B; if a common mode failure which could make the operable DC electrical power subsystems inoperable is not ruled out within the associated Completion Time for Required Action A.1 or B.1; if affected (i.e., supported) required features are not declared inoperable within the associated Completion Time for Required Action A.2 or B.2; if the CTG is not verified to be functional within the associated Completion Time for Required Action A.3; or if the CTG circuit breakers are not verified to be capable of being aligned to two unaffected ESF buses (Division I, Division II, or Division III) within the associated Completion Times for Required Action A.4.

(2) The unit must be brought to a MODE in which the LCO does not apply if one or more of the Required Actions (A.1, A.2, A.3, A.4, A.5, B.1, B.2, C.1, and C.2) of Conditions A, B, and C are not met within the associated Completion Times.

Note that this is a follow-up to RAI 16-52. In addition, the applicant is requested to identify and correct any similar inconsistencies in the GTS bases, and include the changes in STD DEP 16.3-42.

Chapter 6 RAIs

Question	Status	Follow-up Action
16-1	Question Closed/Issue Unresolved	16-21
16-2	Confirmatory Action NRC	Check Rev 4
16-3	Confirmatory Action NRC	Check Rev 4
16-4	Resolved/Closed	none
16-5	Confirmatory Action NRC	Check Rev 4
16-6	Confirmatory Action NRC	Check Rev 4
16-7	Resolved/Closed	none
16-8	Resolved/Closed	none
16-9	Confirmatory Action NRC	Check Rev 4
16-10	Resolved/Closed	none
16-11	Resolved/Closed	none
16-12	Confirmatory Action NRC	Check Rev 4
16-13	Resolved/Closed	none
16-14	Confirmatory Action NRC	Check Rev 4
16-15	Confirmatory Action NRC	Check Rev 4
16-16	Confirmatory Action NRC	Check Rev 4
16-17	Confirmatory Action NRC	Check Rev 4
16-18	Confirmatory Action NRC	Check Rev 4
16-19	Confirmatory Action NRC	Check Rev 4
16-20	Confirmatory Action NRC	Check Rev 4
16-21	Question Closed/Issue Unresolved	RAI 3973
16-22	Resolved/Closed	none
16-23	Confirmatory Action NRC	Check Rev 4
16-24	Confirmatory Action NRC	Check Rev 4
16-25	Confirmatory Action NRC	Check Rev 4
16-26	Confirmatory Action NRC	Check Rev 4
16-27	Confirmatory Action NRC	Check Rev 4
16-28	Confirmatory Action NRC	Check Rev 4
16-29	Confirmatory Action NRC	Check Rev 4
16-30	Confirmatory Action NRC	Check Rev 4
16-31	Confirmatory Action NRC	Check Rev 4
16-32	Resolved/Closed	none
16-33	Confirmatory Action NRC	Check Rev 4
16-34	Confirmatory Action NRC	Check Rev 4
16-35	Confirmatory Action NRC	Check Rev 4
16-36	Confirmatory Action NRC	Check Rev 4

Chapter 6 RAIs

16-37	Confirmatory Action NRC	Check Rev 4
16-38	Resolved/Closed	none
16-39	Confirmatory Action NRC	Check Rev 4
16-40	Resolved/Closed	none
16-41	Confirmatory Action NRC	Check Rev 4
16-42	Confirmatory Action NRC	Check Rev 4
16-43	Confirmatory Action NRC	Check Rev 4
16-44	Confirmatory Action NRC	Check Rev 4
16-45	Confirmatory Action NRC	Check Rev 4
16-46	Confirmatory Action NRC	Check Rev 4
16-47	Confirmatory Action NRC	Check Rev 4
16-48	Confirmatory Action NRC	Check Rev 4
16-49	Confirmatory Action NRC	Check Rev 4
16-50	Confirmatory Action NRC	Check Rev 4
16-51	Confirmatory Action NRC	Check Rev 4
16-52	Question Closed/Issue Unresolved	RAI 4044
16-53	Resolved/Closed	none
16-54	Confirmatory Action NRC	Check Rev 4
16-55	Resolved/Closed	none
16-56	Confirmatory Action NRC	Check Rev 4
16-57	Confirmatory Action NRC	Check Rev 4
16-58	Confirmatory Action NRC	Check Rev 4
16-59	Confirmatory Action NRC	Check Rev 4
16-60	Resolved/Closed	none
16-61	Confirmatory Action NRC	Check Rev 4
16-62	Confirmatory Action NRC	Check Rev 4
RAI 3973	w/STP	
RAI 4044	w/STP	
RAI 4080	w/OGC for review	